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RESPONSE TO 1/15/87 CHL



100 CORPORATE NORTH, SUITE 101
ROUTE 22 AND LAKESIDE DRIVE
BANNOCKBURN, ILLINOIS 60015
(312) 295-6020

EPA Region 5 Records Ctr.



261576

30 January 1987

Mr. Harry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

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IEPA-DLPC

Dear Mr. Chappel:

As noted in prior correspondence, WESTON has been retained by Paxton Landfill Corporation to respond to your IEPA Compliance Inquiry Letter dated January 15, 1987, regarding Supplemental Permits 1983-84-SP and 1984-871-SP, and IEPA Attachment A which addresses what IEPA has characterized as apparent violations that exist at Paxton #2 landfill. This letter addresses each item contained in Attachment A; describes steps which have been taken to correct each point; and provides the requested dates by which they will be resolved in Table 1. Each point is discussed below in the order in which it appears in Attachment A of the Compliance Inquiry Letter:

- 1) Paxton Landfill Corporation has been informed that, pursuant to Permit 1983-84-SP Attachment A, Condition 4 (see IEPA Attachment A), installation of replacement wells for wells G106, G105, G113, G11S, and G11D is a modification to the permit and, therefore, requires a supplemental permit prior to installation. During the course of trench and perimeter seal construction, wells G105, G106, G113, G11S and G11D were all subject to shifting soils, and slowly kinked to the point where they could not be sampled. These wells were all replaced by Roy F. Weston, Inc. (WESTON), at Paxton's direction, so that a minimum number of sample dates would be missed. The supplemental permit is being prepared and will be submitted to the IEPA by March 13, 1987. Complete installation details will be provided with the application for a supplemental permit to relabel these wells.



- 2) In accordance with Permit 1983-84-SP, Condition 5, wells G106, G105, G113, G12D and G12S, which are no longer utilized as monitoring points, will be or have been backfilled with concrete or a bentonite and soil mix. Paxton Landfill Corporation has retained WESTON to perform this work in accordance with standard acceptable practices. Wells G12S and G12D have already been filled by Paxton Landfill Corporation with a bentonite mixture to prevent cross-contamination between aquifers. Details of the well abandonment will be sent to the IEPA by March 13, 1987.
- 3) Pursuant to Permit 1983-84-SP, Condition 8, wells G11D, G13S and G13D were properly capped by Paxton on November 14, 1986, the day after the last IEPA inspection. WESTON confirmed this on 29 January 1987.
- 4) WESTON has been made aware that wells G105, G113, G12S and G12D can no longer be sampled and are in apparent violation of Permit 1983-84-SP, Condition 10. Wells G105 and G113 have kinked and can no longer be sampled (see Response 1). These wells have been replaced and supplemental permits for the installation of replacement wells and details of the well abandonment will be submitted to the agency by March 13, 1987.

Wells G12S and G12D have apparently been the subject of much discussion between Paxton and the IEPA. The result of discussions concerning these wells apparently was a verbal agreement for Paxton to sample points G11S, G15D, G16S, G17S and G18S. Regarding this matter, Paxton also agreed to and has installed approximately 600 feet of additional perimeter seal.

These wells, and wells G12D and G12S, have been sampled on a monthly basis for several years and the data has been submitted to the agency. Within the past year, G12S and G12D have kinked due to soil shifting and could no longer be sampled. These wells were sealed by Paxton with bentonite to prevent contamination of the lower aquifer. The details of this well abandonment along with as-built diagrams will be submitted to the Agency by March 13, 1987.

- 5) It is WESTON's understanding that monitoring well G112 was to be maintained for the use by the



Agency as outlined in Permit 1984-871-SP, Condition 1, however, a letter dated December 19, 1984, from Andrews Engineering to the IEPA (Attachment B) provided notification to IEPA that well G112 was destroyed. This well was located in the path of the perimeter seal and was, therefore, excavated. Supplemental Permit 1984-871-SP (see Attachment C) granted permission to Paxton landfill Corporation to remove G112 from the site's groundwater monitoring program, but requested that the well be kept for use by the Agency. Since the Agency had already been notified that the well had been destroyed, this request was not possible. If the IEPA so desires, Paxton Landfill Corporation will install a replacement well for G112. The location of the replacement well will need to be moved, however, to outside the perimeter seal. Please inform us of your decision so that a supplemental permit application can be prepared, if needed.

- 6) The destruction of monitoring wells at Paxton can be attributed to a number of factors. It is not uncommon for monitoring wells at landfill sites to become kinked, such as has occurred with wells G105, G106, G113, G11S, and G11D, due to soil shifting over the course of landfilling activities. Monitoring wells frequently become inoperable over the years for other reasons such as corrosion, clogging, or silt buildup. Well G113 was approximately 10 years old at the time it was replaced. In regards to Wells G12S and G12D, it is possible that they could have failed as a result of excavation conducted around and near these wells for Dale Helmers of your agency. Paxton regrets the destruction of any of the monitoring wells and has taken the necessary steps to replace them and avoid interruption of their sampling program. The necessary permits will be submitted as outlined in this letter. Paxton also plans to submit a supplemental permit application for a vertical expansion by March 13, 1987.

Paxton hopes that these explanations and the steps outlined above that will be taken in the near future will be satisfactory to the IEPA to achieve full compliance. It is Paxton's desire to work with the agency to resolve these problems.



If you have any questions or require additional information
please contact us.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in dark ink, appearing to read "J.S. Bard", written in a cursive style.

Jeffrey S. Bard
Assistant Project Engineer

A handwritten signature in dark ink, appearing to read "John W. Thorsen", written in a cursive style.

John W. Thorsen, P.E.
Vice President

JSB:JWT:kte

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